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August 1, 2024

## BY ECF

Honorable Brian R. Martinotti, U.S.D.J. United States District Court District of New Jersey 50 Walnut Street Newark, NJ 07102

Re: In re Allergan Biocell Textured Breast Implant Product Liability Litigation, MDL No. 2921

Dear Judge Martinotti:

I write on behalf of the parties with an agreed upon request to modify the schedule set forth in Case Management Order No. 30 regarding the selection and discovery for the Initial Bellwether Discovery Cases.

On May 16, 2024, the Court entered Case Management Order No. 30, which extended the deadline for the parties to select the Initial Bellwether Discovery Cases from June 1, 2024, to August 14, 2024. *See* ECF No. 482. The parties have since conferred regarding the August 14 deadline and respectfully request that the Court grant a two-week extension to August 28, 2024.

Should the foregoing modification of Case Management Order No. 30 be acceptable to Your Honor, we respectfully request that this letter be "So Ordered" and entered on the docket. We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Melissa A. Geist

SO ORDERED:

Melissa A. Geist

S/ Brian R. Martinotti BRIAN R. MARTINOTTI, USDJ DATED: AUG. 2, 2024